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Washington, D.C. 20554

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DEC 10 1993

FCC - MAIL ROOM

Re: Small Cable Business Association; Filing of Emergency Petition for Interim Procedures and Limited Reconsideration of Rate Freeze Order

Dear Mr. Caton:

Enclosed for filing are the original and five copies of the Small Cable Business Association's Emergency Petition for Interim Procedures and Limited Reconsideration of Rate Freeze Order.

We appreciate the Commission's prompt attention to this matter. If you have any questions, please call us.

Very truly yours,

HOWARD & HOWARD



Eric E. Breisach

Enclosures

cc: Chairman Reed Hundt  
Commissioner James H. Quello  
Commissioner Andrew C. Barrett  
Commissioner Ervin S. Duggan

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
)  
Implementation of Sections of )  
The Cable Television Consumer )  
Protection and Competition Act )  
of 1992 )  
)  
Rate Regulation )

MM Docket No. 92-266

**EMERGENCY PETITION FOR INTERIM PROCEDURES  
AND  
LIMITED RECONSIDERATION OF RATE FREEZE ORDER**

**SUBMITTED BY  
THE SMALL CABLE BUSINESS ASSOCIATION**

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Attorneys for the Small Cable  
Business Association

Dated: December 9, 1993

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## **SUMMARY**

The Small Cable Business Association ("SCBA"), a grass roots self-help organization of over 200 independent operators of small cable television systems, through this petition requests that the Commission take emergency action to establish an automatic rate freeze waiver system available to certain operators under limited circumstances so long as the affected franchise authority consents to the rate increase.

SCBA is concerned that the rate freeze, as currently structured, has a disparate impact on operators of small cable businesses and smaller cable systems for two reasons. First, smaller businesses cannot realistically afford to avail themselves of the hardship waiver provision. Second, the combination of the stay of rate regulation for systems with fewer than 1,000 subscribers coupled with the rate freeze extension creates an unintended burden on small system operators.

The Commission's promise of special relief from the rate freeze on a case-by-case basis through the filing of "hardship" petitions is illusory for many systems. The Commission has held operators to an extraordinarily high, virtually unrealistic standard. Furthermore, the Commission measures the effect of the freeze only in terms of the incremental financial harm to be incurred over the remaining life of the rate freeze. Consequently, the closer in time to the expiration of the freeze that a petition is filed, the lower the likelihood that the petition will be granted.

The burden is even greater on the operators of smaller systems. Smaller operators do not have internal staff capable of preparing and filing hardship petitions. The cost of using external professional services to prepare the petition is high and cannot be recovered

over the small subscriber bases of these operators. Most often the cost of preparing the petitions will exceed the additional revenue generated by the rate increase, rendering the hardship petition waiver process unworkable.

The rate freeze, as currently structured, will be lifted for an operator when the franchise authority commences regulation of basic tier rates. Systems with fewer than 1,000 subscribers do not have this option since their franchise authorities cannot regulate rates pursuant to the FCC's stay of rate regulation. Therefore, in the event of a financial hardship where the municipality agrees that an increase is appropriate, the rate cannot be changed without obtaining a hardship waiver from the Commission. Since a hardship petition is not an affordable option, these systems effectively do not have access to a safety net provision.

To alleviate these problems, SCBA proposes that the Commission waive the freeze for operators who file a simple petition containing the following elements:

1. The cable operator's certification that its rates after any increase remain at or below the benchmark rate; and
2. Written consent of the franchise authority to the proposed basic tier rate increase.

As discussed more fully in the body of the petition, this approach would permit, in most states, operators to sit down with their local franchise authorities and discuss the necessity for an amount of the proposed increase. The franchise authority retains all control over whether or not the freeze is lifted for the limited purpose of permitting the rate increase. By withholding consent, the franchise authority can easily refuse a cable operator's

request, thereby preserving all of the public policy objectives articulated by the Commission in its November 10, 1993 *Order*.

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Implementation of Sections of	)	MM Docket No. 92-266
The Cable Television Consumer	)	
Protection and Competition Act	)	
of 1992	)	
	)	
Rate Regulation	)	

**EMERGENCY PETITION FOR INTERIM PROCEDURES  
AND  
LIMITED RECONSIDERATION OF RATE FREEZE ORDER**

**I. INTRODUCTION**

**A. The Small Cable Business Association**

Faced with an unprecedented labyrinth of seamless regulations, several small operators decided to form a self-help group to learn, understand and implement the new requirements. Notice of this group's first meeting spread and on Saturday May 15, 1993, one hundred operators met in Kansas City, Missouri. By the end of the day, the Small Cable Business Association ("SCBA") was formed.

While still in its infancy, SCBA has rapidly grown to over 266 members. More than half of them have fewer than 1,000 subscribers in total. Current SCBA members are listed in Exhibit A.

B. Smaller Businesses And Operators Of Smaller Systems Are Harmed Most By Extension Of The Freeze

SCBA is aware that many of its members are having financial difficulty coping with the cumulative effect of the rate freeze. Although the focus of the regulatory dragnet was to prevent the "bad actors" from taking advantage of the regulatory vacuum prior to the effective date of the rate regulations, many small operators with below benchmark rates were also caught.

Many times, these affected members have very few employees, very low overhead, and generally provide service where no one else would. Often these operators only raise rates every few years. Consequently, a number of SCBA members have not had rate increases for 3 years (2 years preceding the freeze and almost one year during the freeze). These operators have typically been the ones most hurt by the freeze.

C. The Freeze Can Be Phased Out When Safeguards Are In Place To Prevent Abuses

It is a given that the rate freeze cannot continue in perpetuity. At some point the rate regulation methodology established by the Commission must be given an opportunity to work. The purpose of the freeze was to maintain the status quo until franchise authorities had an opportunity to become certified<sup>1</sup>.

SCBA maintains that rate increases could be permitted now so long as sufficient safeguards can be crafted to preclude any circumvention of the procedures that are built into the Commission's rate regulation process.

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<sup>1</sup>In the Matter of Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992, Rate Regulation, *Order*, MM Docket 92-266 (Released November 10, 1993) ("*Freeze Order*").



The Commission, in its *Freeze Order*<sup>2</sup>, and the Commissioners, in their separate statements, recognized that financially strapping a cable operator is in no one's interest; not the subscriber's or the franchise authority's.

Two of the three Commissioners expressed concern over the impact that the rate freeze extension would have on small cable systems<sup>3</sup>. In this Petition, SCBA suggests a simple modification of the rate freeze provisions which would alleviate some of the Commission's and Commissioners' concerns about the adverse impact of the freeze extension while still accomplishing all of the Commission's goals.

## **II. SCBA'S PROPOSAL**

SCBA proposes that the rate freeze be automatically lifted upon the filing of a simple petition with the Commission. The freeze would be lifted for the sole purpose of implementing the rate increase articulated in the petition. This petition would contain the following elements:

### **A. Rates Are Below Benchmark**

The cable operator would certify that its rates for all basic and tiered services, are currently below benchmark levels and that the rates after the proposed increase would

---

<sup>2</sup>*Order* at ¶6.

<sup>3</sup>See the Separate Statement of Chairman James H. Quello ("I am, as always, concerned about the effect of our rules on small cable systems. Therefore, I wish to emphasize that the Commission will entertain petitions for relief filed by operators who can show that the freeze is causing severe economic hardship or threatens the viability of continued provision of cable service"). Also see the Dissenting Statement of Commissioner Andrew C. Barrett ("I am especially concerned that various aspects of the Commission's decision ultimately will increase the burdens on small cable operators, who may experience increased costs and additional confusion with fewer resources available for response.")

remain at or below benchmark levels. This ensures that the rates, even though increased, remain at levels that the Commission has already determined to be reasonable. The current and proposed rates for all tiered services would be listed on the petition.

B. The Franchise Authority Agrees To The Increase

The written consent of the franchise authority affected by the increase in basic tier rates would be attached to the petition. The municipality holds all the cards. It cannot be compelled to sign-off on the proposed increase and presumably will do so only if it believed that the increase was in the best interests of the community and its residents.

The rate freeze would be lifted only for the limited purpose of implementing the rate increase described on the petition. The freeze would be immediately lifted upon the filing of the petition with the Commission. No Commission action would be required.

III. THE ABILITY TO REQUEST FINANCIAL HARDSHIP WAIVERS OFFERS INADEQUATE PROTECTION FOR SMALL CABLE BUSINESSES AND SMALLER CABLE SYSTEMS

A. The Cost Of Filing A Petition Is High

To attempt to make an adequate showing of severe economic hardship, operators must typically retain a lawyer and usually an accountant. The professional fees, even for a simple petition, can easily run into thousands of dollars.

For illustrative purposes, assume that a system serving 1,200 subscribers must pay \$5,000 (even that is a conservative estimate) to have a hardship petition prepared. For a system of this size, the cost is in excess of \$4.00 per subscriber. The cost of the waiver, if granted, would not be recovered during the freeze period, thereby precluding the rate increase from providing the kind of relief that the operator needs.

For smaller operators, the cost per subscriber becomes even greater. Smaller operators typically rely to a greater extent on outside service providers. Consequently, their costs are generally higher. This, coupled with the fact that their subscriber base is typically lower, results in an even higher cost per subscriber.

In most cases, the cost of seeking relief is greater than the amount of revenue that would have been raised by the contemplated rate increase. Therefore, operators can actually lose money by filing a hardship petition, even if the Commission were to grant the waiver.

B. The Commission Maintains A Very High Threshold Requirement To Sustain A Hardship Waiver

The Commission has adopted a very high threshold for the granting of hardship waiver petitions. For example, in the case of *In the Matter of Fidelity Cablevision, Inc., Petition for Emergency Relief, Order*, FCC 93-445 (Released September 21, 1993), the Commission refused relief even though an operator demonstrated that a 5,600 subscriber system would suffer a \$520,000 cash shortfall over the period July 1993 through June 1994. This, coupled with a net cash outflow of \$900,000 for the preceding year, would cause most smaller operators serious concern. Nevertheless, the Commission was not convinced that this constituted "severe economic hardship."

C. The Last Minute Extension Of The Freeze Exacerbated The Plight of Smaller Operators

While the Commission points out that it has always left the door open for the filing of relief petitions, many operators did not seek relief because they thought they could "hold out" until the freeze expired. The initial freeze was set to expire on August 3, the next

extension took it to November 15, and then on November 10, it was extended until February 15. If operators had known up front that the freeze period would be so lengthy, then many would long ago have filed petitions for relief.

Because of the repeated extension of the freeze periods, many operators now find themselves in a position where they are no longer financially capable of paying for such a filing. They have been slowly bled to death.

The cost-benefit of the filing at this late date is also nonexistent. Consider the absolute earliest date that an operator could raise rates under a hardship waiver petition. If an operator files a petition for relief today, even assuming the Commission acted favorably on it within 30 days (January 9, 1994) and, assuming that the operator was able to immediately give the requisite 30 day rate increase notice, the operator could only put the rate increase into effect on February 9, 1994. Since the freeze is set to expire on February 15, the operator would receive the benefit of the rate increase for only six days.

The Commission has also been reluctant to grant hardship waivers since it only looks forward with respect to the amount of money to be foregone during the remainder of the freeze<sup>4</sup>. Therefore, the likelihood of receiving a waiver from the Commission decreases in direct proportion to the remaining duration of the current freeze period. Had operators had an opportunity to present their case on April 5, 1993, the initial date of the freeze period and if the Commission had known that the freeze would continue for over 10 months,

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<sup>4</sup>See, e.g., *Fidelity Cablevision, Inc.* in which the Commission held that since only \$90,000 of the 5,600 subscriber system's total projected cash shortfall of \$321,916 occurred during the remainder of the freeze period, maintenance of the freeze was not causing "severe economic hardship."

compelling cases of financial hardship could have been presented. The ad hoc method of extending the freeze precluded the more reasoned approach.

**IV. THE SCBA PROPOSAL MEETS ALL OF THE POLICY CONCERNS RAISED BY THE COMMISSION**

The Commission's primary reason for extending the freeze is its desire to maintain the status quo on cable rates until municipalities make the decision to regulate basic tier rates by seeking certification<sup>5</sup>. Although the decision to regulate rates is currently manifested by the affirmative action of seeking certification, there is no procedure to manifest the decision not to regulate rates. Many municipalities have examined the issues and decided that there was currently no benefit in regulating rates (presumably because they are serviced by an operator providing quality service at below-benchmark rates). Since there is no method to manifest the intent not to seek certification, systems serving these communities are caught in the dragnet designed to hold the status quo apparently until a sufficient number of other municipalities have sought certification<sup>6</sup>.

At the end of the freeze period, rates in communities that have not sought certification could be raised up to benchmark levels without requiring any consent. SCBA, however, is not asking for an early termination of the rate freeze. The proposed petition procedure is structured very narrowly. While SCBA seeks the right to raise rates during the

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<sup>5</sup>*Freeze Order* at ¶15.

<sup>6</sup>*See, e.g., Freeze Order*, at ¶14 (only a small percentage of franchise authorities have sought certification, therefore additional time is necessary to allow more to become certified.)

freeze period, such increases would be limited to an amount that the franchise authority agrees is appropriate.

Although the franchise authorities are involved indirectly in approving the amount of the rate increases, they are not regulating rates per se. Rather, they are merely stipulating to the Commission that they concur with the operator's request to lift the rate freeze for the limited purpose of the proposed rate increase. In no way does the consent of the franchise authority waive or impair its right to seek certification or even challenge the rates at some point in the future.

It is within the Commission's authority to grant the waiver petition. SCBA asks that the Commission, pursuant to the procedure outlined above, agree to automatically approve the petitions upon filing if they contain both of the necessary elements.

A. The Waiver Would Apply To Cable Programming Service Rates

The Commission has identified the triggering event that extinguishes the freeze not only for the basic tier, but also for the cable programming services tier. It is the certification of the franchise authority to regulate basic tier rates<sup>7</sup>.

The control over the basic tier rates, in the Commission's opinion, provides sufficient protection for cable programming tier rates<sup>8</sup>. SCBA's proposal provides functionally equivalent protection. Since the rates for the basic tier could not be increased without municipal approval, the same safeguard of the exercise of municipal control over basic tier rates exists.

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<sup>7</sup>47 C.F.R. §76.1090(c).

<sup>8</sup>*Freeze Order* at Footnote 12.

Given the direct parallels between the Commission's *Freeze Order* and SCBA's proposal, operators should be allowed to increase not only basic tier rates, but also cable programming service tier rates provided that any rate increases in the cable programming services tier are performed simultaneously with the increases in the basic tier rates. Rate changes to the cable programming services tier would be disclosed to the franchise authority.

**V. OPERATORS OF SYSTEMS WITH FEWER THAN 1,000 SUBSCRIBERS BEAR A DISPROPORTIONATE SHARE OF THE FREEZE'S BURDEN**

While the SCBA supports any actions by the Commission to reduce burdens on any small cable businesses or operators of small cable systems, the Commission's stay of all rate regulation of systems with fewer than 1,000 subscribers, coupled with the extension of the rate freeze, places an unintended disparate burden on these small systems.

The Commission designed the current rate freeze extension to be self-extinguishing upon the certification of the local franchise authority. After the franchise authority commences rate regulation, it can permit a below benchmark system to raise its rates by amounts greater than the price cap limitation. Presumably, franchise authorities will only permit such increases where they are necessary to ensure the continued financial viability of the cable operator. This flexibility is an important safety valve.

Small systems have no meaningful safety valve. Even if the municipality agrees that a below-benchmark system should be allowed a rate increase, absent the filing of a hardship petition as discussed above, any basic tier price increases are simply illegal. The Commission has stayed its rate regulations for small systems. Since the franchise authority for a small system cannot be certified, there is no way for the freeze to be extinguished by local certification. As discussed above, a hardship petition is not a viable alternative,

especially for these small systems. The small system is caught in a trap of unintended consequences.

While the SCBA does not know what rules the Commission will ultimately adopt to regulate rates of systems with fewer than 1,000 subscribers, one reasonable option would be to extend the rate freeze for those systems until the new regulations have been fully implemented. So long as an extension of the rate freeze for these systems is a possibility, it is essential that a safety valve mechanism be provided to adjust rates where circumstances warrant, without having to file a hardship petition.

Operators choosing to avail themselves of this option would have to fully perform the benchmark calculations in order to certify to the Commission that the new rates are at or below benchmark. Although this is a burden that the Commission has currently suspended, operators must perform the computations in order to be able to certify compliance with the benchmark standard. In essence, the small operator is voluntarily complying with the rate regulation provisions as a tradeoff for being able to raise rates to a reasonable level.

It is essential that the unintended consequence of the combination of the stay of rate regulation and the unavailability of the safety valve provision of the rate freeze, both of which looked innocent enough in a vacuum, but when combined create an unintended consequence, be remedied by the Commission. Adoption of SCBA's proposal would resolve this problem.



## **VI. CONCLUSION**

The current financial hardship petition procedure does not provide timely relief or a realistic possibility of obtaining relief for most operators. Especially hard hit are small operators who simply cannot afford to file such a petition.

Since the participation of franchise authorities in the rate regulation process through certification is sufficient to lift the freeze, voluntary participation in a rate increase process should also merit permitting an increase in rates during the rate freeze period.

SCBA's proposal would only permit rate increases in a very narrow set of circumstances. Most importantly, the franchise authorities retain control over the process, despite the fact that they are not certified. If anything, SCBA's proposal gives franchise authorities an option between full scale certification and still providing input on cable rates. SCBA's proposal in no way limits any of the franchise authorities' rights to become certified on even challenge rates at a later point in time.

If there is any information that the SCBA or its members can provide the Commission to assist in evaluation of this Petition, please contact us.

**Respectfully submitted,**

**SMALL CABLE BUSINESS ASSOCIATION**

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Boulder Ridge Cable TV \*\*  
Mr. Dean Hazen  
920 Chattanooga Ave.  
Pacific Palisades, CA 90272

Pacific Sun Cable Partners \*\*  
Mr. David D. Kinley  
7901 Stoneridge Drive, Suite 404  
Pleasanton, CA 94588

Western Cabled Systems  
Mr. Larry Whitney  
818 Douglas Ave.  
Redwood City, CA 94063

Small Cities Cable TV  
Mr. Paul Growald  
423 Washington Street - 4th Floor  
San Francisco, CA 94111

Phoenix Cable  
Mr. David Brunton  
2401 Kerner Blvd.  
San Rafael, CA 94901

Matrix Cablevision, Inc.  
Mr. Brad Daniel  
12333 S. Saratoga-Sunnyvale Rd.  
Saratoga, CA 95070

Saguaro Cable TV  
Mr. Michael Kruger  
513 Wilcox St., Ste. 230  
Castle Rock, CO 80104

Triax Communications Corp. \*\*  
Mr. Dave Downey  
100 Fillmore Suite 600  
Denver, CO 80206

Hermosa Cablevision \*\*  
Mr. Randy Hawks  
355 Animosa Drive  
Durango, CO 81301

Rural Route Video  
Mr. Christopher May  
P.O. Box 640  
Ignacio, CO 81137

Country Cable TV  
Mr. Bob Searle  
Box 3428  
Littleton, CO 80161

Pioneer Cable, Inc. \*\*  
Mr. Stan Searle  
P.O. Box 939  
Monument, CO 80132

J & T Cable  
Mr. Jeff Obermiller  
208 North Main  
Rocky Ford, CO 81067

Big Sandy Telecom  
Mr. Robert J. Lunday, Jr.  
P.O. Box 218  
Simla, CO 80835

B & C Cablevision, Inc.  
Mr. Bill Rogers  
4683 Hwy 6  
Wiggins, CO 80654

Rigel Communications  
Mr. Douglas Feltman  
70 Leach Hollow Rd.  
Sherman, CT 06784

Mid-Atlantic Cable  
Mr. John C. Norwitt  
5335 Wisconsin Ave., N.W. #750  
Washington, DC 20015

GPA Cable of VA, Inc. \*\*  
Mr. George Pancher  
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Osprey, FL 34229

Heartland Cable  
Mr. John J. Greytak  
10001 U.S. 27, South  
Sebring, FL 33870

Milestone Media Management  
Mr. Tom Engel  
1040 Marco Dr., NE  
St. Petersburg, FL 33702

Communications Equity Associates  
Mr. Jay Dugan, Jr.  
101 East Kennedy Blvd., # 3300  
Tampa, FL 33602

Bronson Cablevision, Inc.  
Mr. Tom Hulett  
P.O. Box 89  
Worthington Springs, FL 32697

Annox Inc. \*\*  
Mr. Tom Linder  
115 Perimeter Center Pl. Ste 495  
Atlanta, GA 30346

GWC Communications Co., L.P.  
Mr. Charles L. Greene  
4380 Georgetown Sqr. Rd., #1010 A  
Atlanta, GA 30338

Blackshear TV Cable, Inc.  
Ms. Carolyn M. Lott  
P.O. Box 650  
Baxley, GA 31513

Georgia Cablevision, Inc.  
Mr. Richard Barnett  
P.O. Box 338  
Berlin, GA 31722

Southeast Cable TV, Inc.  
Mr. Bob Heide  
P.O. Box 584  
Boston, GA 31626

Mountain View Enterprises, Inc.  
Mr. Richard K. Marchman  
P.O. Box 665  
Clayton, GA 30525

Plantation Cablevision, Inc.  
Mr. Joel Hall  
P.O. Box 4494  
Eatonton, GA 31024

United Cable Co., Inc.  
Mr. William K. Mitchell  
P.O. Box 1198  
Perry, GA 31069

Clear Vu Cable, Inc.  
Mr. Boyce Dooley  
P.O. Box 368  
Summerville, GA 30704

Saipan Cable TV  
Mr. Lee H. Holmes  
530 W. O'Brien  
Agana, GU 96910

Western Systems, Inc.  
Mr. Lee Holmes  
530 W. O'Brien Dr.  
Agana, GU 96910-4996

Linn Cable Services  
Mr. Fred Knohl  
P.O. Box 208  
Coggon, IA 52218

Teleview Systems Corp.  
Mr. Bob Houlihan  
P.O. Box 35  
Decorah, IA 52101

Interstate Cablevision  
Mr. Mike Weis  
Box 299  
Emerson, IA 51533

Siebring Cable TV  
Mr. Gary C. Siebring  
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George, IA 51237

Gowrie Cablevision, Inc.  
Mr. Paul Johnson  
P.O. Box 145  
Gowrie, IA 50543

Northwest Communications, Inc.  
Mr. Donald Miller  
P.O. Box 186  
Havelock, IA 50546

Dean's Cablevision, Inc.  
Mr. Robert D. Pierce  
115 South Linden  
Lamoni, IA 50140

Bayou Cable, Inc.  
Mr. Allen Booker  
P.O. Box 466  
Marion, IA 71260

Panora Cooperative Cablevision  
Mr. Dale G. Grotjohn  
P.O. Box 217  
Panora, IA 50216

Modern Communications  
Mr. Chester DeJongh  
115 First Ave. West  
Rock Rapids, IA 51246

Spirit Lake Cable TV, Inc. \*\*\*  
Mr. Ed Parsen  
2650 Enterprise Ave.  
Spirit Lake, IA 51360

Ter Tel Enterprises  
Mr. Doug Nelson  
P.O. Box 100  
Terril, IA 51364

Bley Cable, Inc.  
Ms. Nancy Bley Cowen  
121 W. Main St.  
Beardstown, IL 62618

Teleview Cable Systems  
Mr. Frank Redisi  
1520 Commerce Drive  
Elgin, IL 60123

Grand Ridge Cable  
Mr. Ken Douvia  
P.O. Box 657  
Grand Ridge, IL 61325

Moultrie Telecommunications  
Mr. David A. Bowers  
P.O. Box 350  
Lovington, IL 61937-0350

Manhattan Cable TV Company  
Mr. Skip Kraus  
P.O. Box 11  
Manhattan, IL 60442

Full Circle Communications, Inc.  
Ms. Pamela Althoff  
803 N. Front St.  
McHenry, IL 60050

Heartland Cable, Inc.  
Mr. Steven E. Allen  
Box 7  
Minonk, IL 61760

Ervin Cable TV  
Mr. Gary Ervin  
212 E. Lincoln Blvd.  
Shawnee Town, IL 62984

EQC Cable, Inc.  
Mr. Bert S. Engler  
R1 Box 19A  
Campbellsburg, IN 47108

Cable TV Services, Inc.  
Mr. Richard J. Mailloux  
P.O. Box 420  
Goodland, IN 47948-0420

Glass Antenna Sytems, Inc.  
Mr. Dick Glass  
602 N. Jackson St.  
Greencastle, IN 46135

TV Cable of Rensselaer/Winamac  
Mr. Steve T. Filson  
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Rensselaer, IN 47978

Atwood Cable Systems, Inc.  
Mr. Robert Dunker  
423 State St.  
Atwood, KS 67730

Belleville Cable TV \*\*  
Mr. Robert K. Weary Jr  
1809 North St.  
Belleville, KS 66935

Catron Communications, Inc.  
Mr & Mrs. Pete Collins  
203 East 29th  
Hays, KS 67601

H & B Cable Service  
Mr. Rob Koch  
Box 108  
Holyrood, KS 67450

Kline CATV  
Mr. Don Kline  
110 East 10th  
Kinsley, KS 67547

NCTC, Inc.  
14809 W. 95th St.  
Lenexa, KS 66215



Mid-Kansas Cable Services  
Mr. Carl C. Krehbiel  
P.O. Box 960  
Moundridge, KS 67107

Murray Cable TV, Inc.  
Mr. Gene Murray  
108 W. Peoria  
Paola, KS 66071

Quinter Cable Co., Inc.  
Mr. & Mrs. Ken Cooksey  
P.O. Box 423  
Quinter, KS 67752

Ellis Engineering & Construction  
Mr. Holland Ellis  
P.O. Box 270  
Riverton, KS 66770

Douglas Cable Communications \*\*  
Mr. Reavis Gibb  
4100 SW Southgate Drive  
Topeka, KS 66609

Wilson, Lucas Cable  
Mr. Douglas Vicek  
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Wilson, KS 67490

C & W Cable, Inc.  
Mr. & Mrs. Don Williams  
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Annville, KY 40402

Clear Cable TV, Inc. \*\*  
Mr. Gary Burtoft  
211 E. Flacet Avenue  
Bardstown, KY 40004

Aerial Communications, Inc.  
Mr. Doug Jones  
8518 Lynnwood Drive  
Catlettsburg, KY 41129-8936

Bowling Cable TV  
Mr. Daniel Bowling  
P.O. Box 522  
Hyden, KY 41749

Green Tree Cable TV, Inc.  
Ms. Donna J. Lycano  
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Louisa, KY 41230

Green River Cable TV, Inc.  
Mr. Clarence Reid  
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Russel Springs, KY 42642

Red River Cable TV  
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Carlyss Cablevision  
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